

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LOUIS VUITTON MALLETIER S.A.

Plaintiff,

vs.

SUNNY MERCHANDISE CORP. dba
SUNNY SUNGLASSES, LOUIS VALENTIN
EYEWEAR and CHIN ZONG TSAI

Defendant

Civil Action No. 1:13 CV 5242 (JMF)

**DEFENDANTS SUNNY MERCHANDISE CORP. AND CHIN ZONG TSAI'S NOTICE
OF MOTION TO EXCLUDE THE REPORT, OPINIONS, AND TESTIMONY OF
EXPERT CARLA S. MULHERN**

PLEASE TAKE NOTICE that Defendants Sunny Merchandise Corp. dba Sunny Sunglasses and Chin Zong Tsai aka Gene Tsai, by and through their undersigned counsel, will move this Court, before the Honorable Jesse M. Furman, United States District Judge, for an Order pursuant to Rules 403 and 702 of the Federal Rules of Evidence to exclude the report, opinions, and testimony of Plaintiff's expert Carla S. Mulhern.

The requested relief is appropriate for the reasons submitted in the accompanying Memorandum of Law, Declarations, and documentary Exhibits.

DATED: September 2, 2014

Respectfully submitted,

By: /s/Steven E. Lauridsen
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Steven E. Lauridsen

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MERCHANDISE CORP. and CHIN ZONG
TSAI

CERTIFICATE OF SERVICE

This Certificate of Service is made in compliance with Local Federal Rules. I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 515 South Flower Street, Forty-Second Floor, Los Angeles, CA 90071-2223.

On the date indicated below, a true and correct copy of the foregoing **DEFENDANTS SUNNY MERCHANDISE CORP. AND CHIN ZONG TSAI'S NOTICE OF MOTION TO EXCLUDE THE REPORT, OPINIONS, AND TESTIMONY OF EXPERT CARLA S. MULHERN** was lodged with Court and served electronically and will be available for viewing and downloading from the Court's CM/ECF system:

The Notice of Electronic Case Filing automatically generated by the system and sent to all parties entitled to service under the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York who have consented to electronic service shall constitute service of the filed document to all such parties.

Executed on September 2, 2014, at Los Angeles, CA.

I declare under penalty of perjury that I am admitted to practice pro hac vice before the United States District Court for the Southern District of New York and ECF registered in this Court and that the foregoing is true and correct.

/s/Steven E. Lauridsen
Steven E. Lauridsen